



**PSA 13
Senior Council
Area Agency on Aging**

MONITORING REPORT

October 26-29, 2009



California Department of Aging (CDA) Staff

An onsite assessment of the Senior Council/Area Agency on Aging (SCAAA) was conducted by CDA staff from October 26-29, 2009. The following CDA Staff were present or conducted a desk review assessment:

Don Braeger	Policy Manager	Long Term Care and Aging Services Division
Eura Trent	Aging Programs Specialist	Administrative Services
Anthony Perez	Fiscal Program Specialist	Fiscal Program Services
Joel Weeden	FCSP Specialist	Title III-E Family Caregiver Support Program
Andrea Bricker R.D.	Public Health Nutritionist	Title III C Elderly Nutrition Program and Title III D Disease Prevention and Health Promotion
Michael Alward	Aging Programs Analyst II	Title III D Disease Prevention and Health Promotion
Scott Crackel	Aging Programs Analyst II	Title III-B Supportive Services, Information and Assistance and Disaster Preparedness
Xochi Prock	HICAP Program Analyst II	Health Insurance Counseling and Advocacy Program (HICAP)

Monitoring Report

Throughout the monitoring report, either Senior Council/Area Agency on Aging (SCAAA) or Area Agency on Aging (AAA) is used to refer to the Senior Council/Area Agency on Aging. In every instance, the two terms are synonymous. CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA). This report includes:

- Recap of the standards monitored during the visit.
- If discovered during the monitoring visit, recognition of best practices or models of service delivery that will be shared with the aging network by a notice posted on CDA's website.
- Findings and required actions to be taken by the SCAAA to correct specific findings associated with the monitoring visit.
- Corrective Action Plan to be completed by SCAAA and submitted to CDA.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards reviewed by the monitoring visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

AAA Administrative Review

Governing Board

Eura Trent met with Clay Kempf, Executive Director, and Charles Scott, Governing Board Chair, to determine if the Governing Board recognizes and fulfills its roles and responsibilities required by all regulations, laws, and contracts. Mr. Scott was knowledgeable about the workings of the AAA and the role of the Governing Board. The Board works with AAA staff by reviewing and approving the Area Plan and annual updates, executes contracts, and approves policy for the SCAAA.

Advisory Council

Eura Trent and Don Braeger met with Clay Kempf, Executive Director, to determine if the Advisory Council assists the AAA in developing a coordinated community-based system of care for older persons living within the PSA. The Advisory Council is involved in all matters related to the development and administration of the Area Plan. Currently the Advisory Council has five vacancies. The Advisory Council is consistently seeking to diversify its ethnic composition by individual outreach into the community.

Staffing and Organization

Eura Trent met with Patty Talbott, Associate Director, to establish if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. The most recent organizational chart was reviewed and verified positions identified in the budgets submitted to CDA matched the AAA's organizational structure. Staff attend work related training and conferences such as California Association on Area Agencies on Aging (C4A). The Desk and Personnel Procedures Manual was reviewed, and determined that personnel practices and procedures have been established.

Procurement/Contract Process

Eura Trent met with Patty Talbott, Associate Director, to determine if the AAA had established systematic procedures containing statutory language for the administration of contracts and to ensure contracts are awarded through an open and competitive process. The SCAAA has developed a unique four year service provider contract agreement and is currently in the process of revising their Request for Proposal (RFP). The RFP from the 2006/10 process was reviewed and there were no appeals, grievances, or lawsuits filed as a result of this RFP.

Management of Service Providers

Eura Trent met with Patty Talbott, Associate Director, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. Ms. Trent reviewed the monitoring schedule and service provider files. The AAA distributes information to a network of service providers through regular email

communication and will contact providers directly by telephone as needed. Technical assistance is provided on a regular basis to ensure the contracted service activity levels are met.

Data Reporting

Eura Trent met with Patty Talbott, Associate Director, to determine if the AAA has a procedure in place for reporting and verify data collection. The AAA uses a web-based software for reporting and submits reports to CDA on a regular basis. Training and technical assistance is scheduled as needed with service providers to assist with reporting issues and help maintain timely submission of quarterly reports.

AAA Fiscal Review

Anthony Perez met with Shary Greene, Fiscal Officer, and Dora Marcus, Fiscal Assistant, to ensure the Seniors Council maintains a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the Seniors Council and its service providers. The agency's accounting system is computerized using Excel spreadsheets, Quick-books Premier Non-Profit Edition 2009 and the web-based CARS reporting system. The Seniors Council maintains proper documentation and several reported expenditures from August 2009 were traced through the accounting system to the originating invoices for verification. Mr. Perez additionally reviewed executed service provider contract language for fiscal requirements, fiscal monitoring assessment reports, and the fiscal officer's desk procedure manual. This section provides a recap of the standards monitored during the visit and the recognition of fiscal staff that assisted CDA to accomplish its work.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

Scott Crackel met with Patty Talbott, Associate Director, to review the Title IIIB Supportive Services Monitoring Tool that was sent to the AAA prior to the site-visit. The major areas discussed included program operations and administrative program procedures, to assure all program requirements are being met.

The AAA contracts for multiple Title IIIB Supportive Services: Legal, Visiting, Registry, Outreach, Transportation, Assisted Transportation, Tax Counseling Assistance, and Home Repair. These services are monitored at least annually. The AAA provides self-assessment tools that the providers complete and submit to the AAA.

The AAA utilizes its own monitoring tools for oversight of its Title IIIB Supportive Services Programs, which were furnished for review. Ms. Talbott also furnished Mr. Crackel with copies of a sample donation letter and sample client satisfaction survey.

Title III B—Information and Assistance (I&A)

Scott Crackel interviewed Patty Talbott, Associate Director and reviewed the I&A monitoring tool, contract, and RFP Scope of Work. I&A is a contracted service provided by Senior Network Services (SNS) in Santa Cruz and Watsonville, and Jovenes de

Antaño in Hollister. There are four I&A staff members in the AAA, including two part-time in Santa Cruz, and one full-time position each in Watsonville and Hollister. Brenda Moss, I&A Director supervises all staff outside of Hollister. Pauline Valdivia, Program Director supervises staff in Hollister.

During the monitoring visit, Mr. Crackel called the 1-800-510-2020 line during the day and in the evening. During the daytime, the call was triaged by an I&A staff person, who inquired about the need and asked the age of the person in need. She then referred the call to an intake specialist for further handling. After hours, calls go to voicemail.

Mr. Crackel checked the local telephone books for references to senior services. The Santa Cruz Area 2009 Directory of White and Yellow pages listed the 1-800-510-2020 number under both "Senior Citizens Services" and "Area Agency on Aging."

SNS has a computerized database for its resource directory, and distributes another 10,000 printed directories in both English and Spanish. A generic, low intensity call is documented on a No-Name Intake Form; calls requiring more assistance are documented on the SNS I&A Intake Form. The SNS I&A Intake Form is comprehensive but does not clearly document unmet needs.

Disaster Preparedness

Scott Crackel discussed disaster preparedness with Maejean Foskett, I&A Representative at her Senior Network Services (SNS) facilities. She keeps emergency information posted at her desk for quick access in the event of emergency and has been trained in disaster preparedness within the last year. Mr. Crackel interviewed Clay Kempf and Patty Talbott separately regarding disaster preparedness efforts. Mr. Kempf stated that AAA providers can act independently as needed. The AAA has made contact with the Counties of Santa Cruz and San Benito Offices of Emergency Services (OES).

Title III C—Elderly Nutrition Program (ENP)

Andrea Bricker, R.D. and Michael Alward, conducted an assessment of the ENP services in Santa Cruz and San Benito Counties. The assessment included the review of the two ENP contracted service providers; Jovenes de Antaño which provides services for San Benito County and Community Bridges, Meals on Wheels for Santa Cruz County. Caren Dix, R.D., AAA Consultant R.D., and Patty Talbott, provided their time and assistance in completing a review of the nutrition programs.

Prior to the monitoring visit CDA staff reviewed the AAA Request for Proposals (RFP) and contracts. During the AAA and site visits the following were reviewed; donation request signs and donation procedures, current ENP menu compliance with Dietary Reference Intakes (DRI) and the Dietary Guidelines for Americans, Home-Delivered Meal (HDM) pack-out and procedures, annual and quarterly monitoring reports, eligibility assessments, contracts, quarterly staff training, training evaluations, nutrition education plans, topics, evaluations and the CDA ENP monitoring tool.

CDA staff and Ms. Dix visited the Jovenes de Antaño central kitchen at the Hollister Community Center. CDA staff met with Pauline Valdivia, Executive Director who reviewed the overall administrative processes and Abigail Ramirez, Home-Delivered Meals Coordinator who reviewed the HDM program. The site has a volunteer registered dietitian, Jennifer Bange, who creates the yearly nutrition education plan and provides quarterly nutrition education to the congregate meals clients. Ms. Dix provides the nutrition education for the HDM clients. CDA staff observed the central kitchen and HDM pack out and reviewed the eligibility assessments, donation letters, and menu compliance. Congregate meal service and donation process was observed at the Hollister Community Center, Golden Age Nutrition Program, with the assistance of Site Coordinator, Sadie Hernandez.

CDA staff and Ms. Dix visited the Community Bridges, Meals on Wheels for Santa Cruz County central kitchen at the Live Oak Senior Center. CDA staff met with Lisa Berkowitz, Program Director and Bonnie McDonald, Program Manager for the HDM program. CDA staff observed the central kitchen, the HDM pack out and reviewed the eligibility assessments, donation letters, and menu compliance. Congregate meal service was observed at the Loudon Nelson dining site in downtown Santa Cruz. Ms. Dix conducts all of the nutrition education for the Meals on Wheels for Santa Cruz County Congregate and HDM programs.

Title III D—Disease Prevention and Health Promotion

Andrea Bricker, R.D. and Michael Alward, met with Clay Kempf, Executive Director to review the Title IIID monitoring tool and discuss the Title IIID Health Promotion Disease Prevention and Medication Management programs. The AAA is a direct service provider of these programs. Although the AAA has provided outreach on services, they have not conducted any medication management activities for Fiscal Year (FY) 2008-09 year due to staffing and budget constraints.

Title III E—Family Caregiver Support Program (FCSP)

The Family Caregiver Support Program is now an entirely subcontracted service of the AAA. The multifaceted system of FCSP support services in San Benito County is effectively delivered by Jovenes de Antaño. In Santa Cruz County, the AAA subcontracts with Senior Network Services to serve as the FCSP "lead" provider, and this agency reallocates/awards a portion of its grant to "sub" subcontractors – Alzheimer's Association, Salud Para la Gente Elderday, and Senior Citizens Legal Services. The AAA's program records system for these two subcontractors continues to a "best practice" and allowed CDA to conduct a comprehensive review of the AAA oversight and contracts administration procedures.

Joel Weeden conducted field visits with the two AAA subcontractors. Productive discussions were held with:

- Jovenes de Antaño – Pauline Valdivia, Executive Director, along with Patty Talbott, Director Associate and CDA Scott Crackel, CDA Staff; and

- Senior Network Services – Brenda Moss, Executive Director, Cindy Adams FCSP Resource Counselor, and Carol Sichak, Employment Specialist, along with Clay Kempf, Executive Director and Don Braeger, CDA Program Manager.

Specific Program Reports—Older Californians Act Programs

Health Insurance Counseling and Advocacy Program (HICAP)

Xochi Prock conducted an assessment of the AAA HICAP Program via desk review. During the desk review, documents related to the provision of HICAP services were reviewed. The AAA contracts with Senior Network Services to provide HICAP services for the PSA. Ms. Prock spoke with Patty Talbott, AAA Assistant Director as well as Debbie Reed, HICAP Program Manager, via telephone on various occasions to discuss HICAP service delivery.

Additionally, the relationship between the AAA and the HICAP allows for assuring program performance meets or exceeds benchmarks established by CDA. This is especially significant during a transition period when performance may be susceptible to decreases.

FINDINGS REQUIRING CORRECTIVE ACTION

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on September 24, 2009. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

Administrative Review

At the time of the monitoring visit, the SCAAA had three vacancies. According to the Governing Board bylaws, a specified number of positions are required to serve on the Governing Board.

Corrective Action: Fill vacancies as required by the Governing Board bylaws and recruit board members that represent the ethnic composition of the community.
(Repeat Finding, 2005)

The Advisory Council should represent the percentage of the PSAs older population and race and ethnicity for each of the following categories: [CCR Section 7302(a)(12)(D)]

1. White
2. Hispanic
3. Black
4. Asian/Pacific Islander
5. Native American/Alaskan Native
6. Other

Corrective Action: Recruit Council members that represent the ethnic composition of the community and fill vacancies as required by the Advisory Council bylaws.
(Repeat Finding, 2005)

While reviewing current policies and procedures, CDA staff found the SCAAA must update all procedures/manual required to meet AAA administrative and program responsibilities that relate to specific job duties and personnel policies.
[Title 22 7250(1)(B)]

Corrective Action: Update and/or create written personnel policies and procedures manual clearly designating lines of staff responsibility and authority.

CDA staff reviewed SCAAA service provider contracts. The AAA is required to include language in their contracts for the service provider to include the identity of each focal point and requirements with respect to the provision of services to low-income minorities.
[CCR Section 7364(a)(5)]

Corrective Action: Ensure service provider contracts include the identity of each designated community focal point.

CDA staff reviewed reports submitted for FY08/09 and found that all reports were submitted late. The SCAAA shall assure that all data submitted is timely, complete, accurate, and verifiable. In addition, if a report is late, the AAA shall submit a written explanation to CDA Data Team within 10 working days including an explanation for the delay and a date the report will be submitted. [CDA Standard Agreement Exhibit E, Article II(B)]

Corrective Action: Ensure required data reports are submitted by the due dates specified.

AAA Fiscal Review

The current fiscal monitoring tool does not have a subrecipient or subcontractor contract review section. The AAA contracts out to Senior Network Services for the Family Caregiver program (Title III E) funding via a Memorandum of Understanding (MOU) to various subrecipient providers such as the Alzhiemers Association, Elder Day Care, and Legal Services. The fiscal officer was not aware that there were subrecipients, and that the fiscal monitoring tool was not designed to review second level providers. [45 CFR Part 1321.11]

Corrective Action: Ensure that the fiscal officer incorporates a subrecipient contract review section in her fiscal monitoring tool.

For conducting fiscal monitoring and onsite program monitoring, evaluate, and document subcontractor performance. The fiscal officer's purview over the Senior Network Services' Family Caregiver program which contracts out via an MOU to the Alzhiemers Association, Elder Day Care, and Legal Services should have incorporated this funding allocation when conducting a fiscal monitoring visit at the provider's site as of June 2009. [45 CFR Part 1321.11]

Corrective Action: Ensure that the fiscal officer requires Senior Network Services to develop and perform an annual fiscal review at the sites of all three (3) subrecipient provider fiscal records. In addition, the fiscal officer's monitoring tool can be used as a basis for conducting the Senior Network Services' fiscal review.

The AAA must maintain effective control and accountability for all cash, real and personal property, and other assets. The California Aging Reporting System (CARS) fiscal reporting system is not part of the fiscal officer's procedures manual. The AAA has been using the CARS system for a year without setting up the necessary procedures should the fiscal officer not be available to report expenditures and request for funds. [A-110, Section 21(b3)]

Corrective Action: Develop and prepare written procedures for the CARS reporting system to be included in the desk procedures manual.

The AAA must maintain effective control and accountability for all cash, real, and personal property, and other assets. Adequate procedures for processing service provider budgets needs to be updated in the fiscal procedures manual. Page 36 of the manual, checks for accuracy and attachments received. It does not provide a step process where funding sources such as matching cash, non-match cash, in-kind costs, program income are reviewed for accuracy, timeliness of reports, budget changes, etc. are reviewed for completeness. [A-110, Section 21(b3)]

Corrective Action: Update the Fiscal Procedures Manual to include procedures for accepting budgets and budget revisions from service providers.

The AAA shall maintain accounting records which adequately identify the source and application of funds. These records must contain information pertaining to grant awards, obligation balances, assets, liabilities, expenditures and income. Fiscal staff applied an incorrect percentage of minimum match required for the III B, C-1, C-2 and III D programs in their budgets. Service provider budgets show 10%, .053% less than what is required for these programs. Any reduction to the required minimum match may entitle contractors to a higher Federal Share amount. [A-110, Section 21(b2)]

Corrective Action: Ensure that all service provider budgets include the required minimum match of 10.53% for their Title III B, C-1, C-2 and III D programs.

The fiscal officer held a fixed asset schedule containing many items purchased with government funds over the years, however, that listing did not have serial numbers for items purchased. The Report of Property Furnished/ Purchased with Agreement Funds (CDA 32) submitted with the CDA 122 Closeout report in September 2009 was incomplete as it reflected only three purchases made in FY 0809. [A-110, Section 21(b3)] **Repeat finding from 2001 and 2006.**

Corrective Action: Ensure that the fiscal officer submit a complete listing of all items purchased with CDA funds, including serial numbers, on the CDA 32 to the Department by the date of corrective action or sooner.

Title III B—Information and Assistance (I&A)

I&A staff members are not consistently completing follow-ups and documenting outcomes of referrals when clients are linked to services. [Title 22, CCR Sections 7527, 7533, 7537, and 7545]

Corrective action: Ensure adequate staff resources are allocated to complete and document a follow-up outcome for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual's service needs were met.

The I&A resource directory distributed by the AAA does not list the address or days/hours of operation of all of the service providers. [Title 22, CCR Section 7531]

Corrective action: Ensure address and days/hours of operation are included in all public information distributed on Older Americans Act Programs.

Title III C— Elderly Nutrition Program

CDA staff observed peeling paint and janitorial equipment being stored in the dry storage area at the Hollister Community Center. It is required that a room, area, or cabinet separated from any food preparation or storage area, or ware washing or storage area shall be provided for the storage of cleaning equipment and supplies. All food shall be stored so as to be pure and free from adulteration and spoilage; shall be protected from dirt, vermin, unnecessary handling, droplet contamination, overhead leakage, or other environmental sources of contamination.
[CRFC 114281, CRFC 113980]

Corrective Action: Ensure the Hollister Community Center stores janitorial supplies in a designated room, area or cabinet separate from any food storage areas.

Corrective Action: Ensure surfaces at the Hollister Community Center are free from the risk of contamination by peeling paint in the dry storage area.

A review of refrigerator and freezer logs found temperatures at the Hollister Community Center were always 35 degree Fahrenheit (°F) and freezer temperatures were always 1 °F for two consecutive months. CDA staff observed the temperatures of the refrigerators at 42, 40, 32, 34 °F and the walk-in freezer temperature was -10 and -20 °F.
[CDFC 1139.47.1]

Corrective Action: Ensure the Hollister Community Center staff records accurate refrigerator and freezer temperatures on temperature logs.

A review of the daily temperature control charts from the Jovenes de Antaño HDM routes, found the meals from trucks two and three are consistently returning to the kitchen with temperatures below 135 °F. At the time of the visit one of the HDM trucks was having a heating unit repaired. Hot and cold holding of potentially hazardous food when time is used as the public health control, potentially hazardous food shall be maintained at or above 135 °F, or at or below 41 °F.

During the previous monitoring visit in April of 2005, it was found that temperature checks showed two of the three trucks returning to the kitchen without temperatures continually at or above the recommended 140 °F*. At the time of the visit, the following technical assistance was provided: Jovenes de Antaño could either (1) take the temperatures at the end of the route instead of waiting until the meals are returned to the kitchen, or (2) add hot tiles to the heat compartment to provide extra heat. This recommendation was reiterated to Ms. Dix during the October 2009 monitoring visit.
[CRFC 113996 (a) and CRFC 114037 (d)]

Corrective Action: Ensure Jovenes de Antaño HDM maintain temperatures at or above 135°F. *The CRFC regulations changed as of July 2007, reducing the required hot holding temperature from 140°F to 135°F.

A review of the HDM program at Jovenes de Antaño found that no written instructions were provided to HDM participants. Ms. Ramirez provided verbal heating and storing instruction during the in-home HDM initial assessment process. Each HDM provider shall provide written instructions in the language of the majority of participants for handling and re-heating of the meals. [CCR Section 7638.3 (b)]

Corrective Action: Ensure Jovenes de Antaño HDM participants receive written instructions in the language of the majority of the participants for handling and reheating of the meals.

A review of HDM participant intake forms found Jovenes de Antaño is identifying HDM drivers as HDM participants. HDM drivers do not meet the specified requirements of eligible HDM participants. An individual eligible to receive a home-delivered meal are any older individual who is frail, and home bound by reason of illness, disability, or isolation. [CCR Section 7638.7 (c)]

Corrective Action: Ensure Jovenes de Antaño correctly identifies eligible participants for congregate and home-delivered meals.

A review of the Jovenes de Antaño HDM assessment forms found there was no date provided to identify when the participant intake forms and initial assessments were completed. Therefore CDA staff was unable to determine if the initial assessment was completed within two weeks of beginning meal service. Additionally, a review of ten HDM participant intake forms found that no quarterly assessments were completed to verify eligibility. [CCR Section 7638.3 (a)(2) and CCR Section 7638.3 (a)(4)]

Corrective Action: Ensure Jovenes de Antaño completes a written assessment of HDM participants within two weeks of beginning meal service and verifies and documents that all HDM participants are assessed quarterly to verify continued eligibility.

A review of the HDM client intake process found client records were placed in an unlocked cabinet awaiting computer entry. Records with client names, addresses and phone numbers shall remain in a secure, locked file or secure area to protect confidentiality of the record. [CCR Section 7500 (b)(2)]

Corrective Action: Ensure confidential participant files at Jovenes de Antaño are kept in a locked and secured cabinet or area.

A review of ten HDM participant intake forms found that only three of the forms contained a completed nutrition risk screening. Each ENP shall conduct a nutrition screening of congregate and HDM participants. [OAA Section 339 (2)(J) and CCR Section 7636.1 (b)(7)]

Corrective Action: Ensure the Jovenes de Antaño staff complete the Determine Your Nutritional Checklist to identify the nutrition risk of the congregate and HDM participants.

CDA staff observed change being made from participant donations. The nutrition services provider shall establish written procedures to protect contribution and fees from loss, mishandling, and theft. Such procedures shall be kept on file at the provider's site. [CCR Section 7638.9 (f)]

Corrective Action: Maintain a separate cash box for making change at the Hollister Community Center and the Loudon Nelson Center.

CDA staff observed the donation process at the Hollister Community Center. The Hollister Community Center has an envelope donation process. Seniors are provided a donation envelope when they sign-in. Once all the seniors have been seated, the site manager goes around the room with a basket to collect the envelopes. Not all seniors were given an envelope. This method may identify seniors who did not make a donation. The provider shall ensure that the amount of the eligible participant's contribution is kept confidential. [CCR Section 7638.9 (e)]

Corrective Action: Ensure confidentiality of participant donations at the Hollister Community Center.

A review of language for Jovenes de Antaño and MOW for Santa Cruz County found menus and donation signs did not contain the appropriate language. A review of the MOW for Santa Cruz County website found it also did not contain the appropriate language. The area agency on aging shall ensure that each service provider will provide each recipient with opportunity to voluntarily contribute to the cost of the service and to clearly inform each recipient that there is no obligation to contribute and the contribution is purely voluntary. No eligible individual shall be denied participation because of frailty or inability to contribute. [OAA Section 315 (b)(A) and (B) and CCR 7638.9(d)]

Corrective Action: Ensure that all requests for donations include a statement to clearly inform each participant there is no obligation to contribute, the contribution is purely voluntary and no one will be denied participation if they are unable to contribute.

A review of the meal substitution procedure with Ms. Dix identified that providers do not request approval for substitutions on planned menus. Several options were given to Ms. Dix to help efficiently meet this requirement; (1) write a list of appropriate food substitutions that do not need her approval, (2) if a major substitution is needed (i.e.:

main dish or entrée) this would require a phone call, fax, or an email. Food substitutions to meals originally planned must meet the requirements and be approved by a registered dietitian. [CCR Section 7638.5 (c)]

Corrective Action: Ensure the AAA R.D. approves substitutions that meet menu requirements prior to meal service.

A review of the HDM menus at MOW for Santa Cruz County found that the AAA dietitian did not review and approve these menus. A meal analysis approved by a registered dietitian shall be done to ensure compliance. [CCR Section 7638.5 (b)]

Corrective Action: Ensure the AAA R.D. reviews and approves all nutrition service provider menus prior to meal service.

A review of the staff/volunteer training found that the topics of accident prevention, fire safety and earthquake preparedness were not included in the curriculum. All staff, paid and volunteer, shall be oriented and trained to perform their assigned responsibilities and tasks. Training, at a minimum, shall include the following topics: food safety, prevention of foodborne illness, and HACCP principles, accident prevention, instruction on fire safety, first aid, choking, earthquake preparedness, and other emergency procedures. [CCR Section 7636.5 (a)(1)(2)]

Corrective Action: Ensure the staff/volunteer training for Jovenes de Antaño and MOW for Santa Cruz County include accident prevention, fire safety, and earthquake preparedness.

A review of the staff/volunteer training records found there was no evaluation of the staff/volunteer training provided for Jovenes de Antaño and Meals of Wheels for Santa Cruz County. Training sessions shall be evaluated by those receiving the training and documentation of training to include evaluations and attendance records shall be maintained. [CCR Section 7636.5 (e) and (f)]

Corrective Action: Ensure staff/volunteers who receive training are given the opportunity to evaluate the training received.

A review of the ENP 2005-06 RFP found references to Section H and Recommended Dietary Allowances (RDA). A review of the service provider contracts for Jovenes de Antaño found references to United States Department of Agriculture (USDA) for Nutrition Services Incentive Program (NSIP) funds, RDA, and outdated NSIP definition. These references are outdated and should be revised to reflect the current law, requirements, and definitions.

Corrective Action: Ensure RFP and service provider contracts reflect current references to laws, regulations, and definitions.

During an interview with PSA 13 staff found that currently there are no written ENP policies and procedures in place to provide guidance to providers. Per Ms. Dix and Ms. Talbott they will have the ENP policies and procedures completed in the near future.

Corrective Action: Develop written AAA policies and procedures specific to the Title III-C ENP in order to implement all of the requirements of the OAA and CRFC.

Title IIID— Health Promotion Disease Prevention

A review of Medication Management services in PSA 13 found there are currently no Medication Managements services being provided. Medication Management is a required service with a separate funding allocation. [CDA Standard Agreement, Exhibit A, Article I (A)(9)]

Corrective Action: Ensure the required service Medication Management is provided.

Title III E—Family Caregiver Support Program (FCSP)

For FY 09-10 the AAA allocated Title IIIE funds utilizing former detailed budget categories, rather than in accordance with the broader five federally mandated support service components. This resulted in renegotiated contracts containing proposed performance levels in no longer applicable budget categories. The AAA was aware of the error and adjusted FCSP performance outcomes to meet current requirements before submitting data to CDA, but the AAA grantees have continued to deliver FCSP services with outdated standards. [OAA 373(b) and (e)(1) and CDA PM 08-03]

Corrective Action: Award Title III E funds in accordance with the broader five federally mandated support service components, and ensure grantees deliver services in accordance with these federal categories (report performance outcomes utilizing CDA's more specific FCSP Service Matrix).

Grantees determine client eligibility and access to funded services, have performance measured against contracted service unit plans and service budgets, and have a reconciliation of grant payments to actual costs incurred. Vendors receive reimbursement for ordered goods and services based on a pre-agreed unit price negotiated with the entity that determines eligibility and service need. Senior Network Services has established MOUs with its "sub" subcontractors that did not meet either grant or vendor expectations. As a result, these agreements included service performance requirements, but did not specify the required match for meeting non-federal share requirements. There was also confusion between the AAA and provider over meeting federal and State oversight responsibilities, including verifying match eligibility and ensuring compliance with Title III E requirements for client eligibility, service criteria, and application of priorities. [2 CFR 230.210 (OMB Circular A-133)]

Corrective Action: Reassess AAA procurement procedures that have allowed for granting federal funds via "sub" subcontractor arrangements in order to ensure AAA compliance with federal grantee or vendor requirements.

Systems for providing supportive services (including FCSP multifaceted caregiver support systems) facilitate accessibility to, and utilization of, all supportive services throughout the PSA area with a minimum of duplication. Jovenes de Antaño public information ensures efficient use of available FCSP services. However, similar readily accessible public information is not provided to Santa Cruz County family caregivers by Senior Network Services and its network of “sub” subcontractors through the provider websites or the Senior Resource Directory for Santa Cruz County. [OAA 302(1)]

Corrective Action: Expand public information on OAA-funded services so that it facilitates access to AAA-funded and other caregiver supports by family caregivers, potential caregivers, older adult caregivers of a child, and those that may assist them with their caregiving responsibilities.

The intake process utilized by the Senior Network Services Registry Program did not document frailty-related eligibility criteria and caregiver assessed need for this Supplemental Service. [OAA 373(c)(1)(B) and OAA 102(a)(22)(A)(i) and (B)]

Corrective Action: Require the Senior Network Services Registry Program to document caregiver eligibility for receiving FCSP Supplemental Services based on their caring for an elder meeting the definition for “frail.”

Cost sharing fees can be charged for the receipt of OAA-funded services only if permitted by the State. California has not developed or implemented cost sharing criteria that would allow for the collection of consumer “fees” in association with the delivery of an OAA-supported service. The AAA Providers Self-Assessment tool completed by Senior Network Services for FY 08-09 identified that “partner agency, Elderday, requires family/informal caregivers to contribute to payment for program attendance” when using Title III E Respite Care funds. [OAA 315(a)]

Corrective Action: Ensure the Salud Para la Gente Elderday provision of OAA-eligible Respite Care is clearly distinguished from any sliding scale, free day, or similar adult day care program income generating fee/contribution policies.

The Senior Network Services FY 09-10 MOU with Salud Para la Gente Elderday allocated a “sub” grant of \$14,000 of Title III E funds for the provision of FCSP Respite Care. However, the MOU all called upon the “sub” grantee to provide 40 hours of FCSP-related Comprehensive Assessment and Case Management, and report performance data for Community Education, Community Outreach, and Caregiver Support Groups. OAA-related performance is to reflect outcomes that result only from the Area Plan Total Budget Costs for a program, which includes the federal share, match, program income, and (if any) other budgeted non-match funds). [OAA 373(e)(2)]

Corrective Action: Report FCSP performance tracking data only for those Title III E eligible services that are covered by the FCSP Total Budgeted Costs in the Area Plan Budget and in subsequent agreements with the AAA’s subcontractors.